

IN THE CIRCUIT COURT
OF THE EIGHTEENTH JUDICIAL CIRCUIT
IN AND FOR BREVARD COUNTY, FLORIDA

STATE OF FLORIDA

Melbourne Police Department Case No. 2025-00043156

VS.

DAVID JERALD MILLER

Court Case No.

AFFIDAVIT FOR ARREST WARRANT

State of Florida
County of Brevard

BEFORE ME, **Lieutenant John Chapman #392**, a sworn law enforcement officer, personally came Detective Christopher Thomas #4858, of the Melbourne Police Department, who being duly sworn deposes and says: that Affiant has reason to believe and does believe that probable cause exists for the arrest of **David Jerald Miller, DOB: 11/03/1963, White, Male, 6'0", 260 LBS, SSN [REDACTED]** for a violation of the laws of the State of Florida, to wit: **Sexual Battery on Mentally Defective Person**, contrary to **794.011(4)(b)** Florida Statutes. Which occurred at [REDACTED]
[REDACTED]

THE FACTS tending to establish the grounds for this application and the probable cause of Your Affiant believing that such facts exist are as follows:

On Friday, May 16, 2025, the Melbourne Police Department (MPD) responded to [REDACTED]
[REDACTED] Florida Department of Children and Families (DCF) requested MPD respond for a joint investigation into sexual abuse. The abuse was captured on video surveillance footage and provided to DCF.

Your Affiant responded to [REDACTED] and made contact with DCF Adult Protective Investigator Camesha Howard. Howard advised Collen Moreau received three video clips from a Blink camera capturing a single sexual battery of the victim. Moreau is the victim's Agency for Persons with Disabilities (APD) Coordinator. The victim is an adult female who is non-verbal and diagnosed with down syndrome. The video captures the victim [REDACTED] David Miller who is nude, sitting the victim onto the toilet facing him. Miller then inserts his penis into the victim's mouth. Miller's face is captured in the bathroom mirror. The clips are absent of a time stamp. These video clips were uploaded to evidence.com. Moreau obtained the clips from Starr Batten who reported the abuse to her. The victim was [REDACTED] and placed in the protective custody of DCF. Investigator Howard provided a copy of the DCF report.

Your Affiant made contact with Miller who provided a sworn video statement. Miller advised he ended his relationship with his girlfriend Dana Raleigh the night prior. Miller stated Raleigh took his phone and sent videos of him and [REDACTED] to people. Miller, having seen the video of the

sexual battery, alleged Raleigh altered the video. When asked why this was his belief Miller responded, "How can it be black and white if all I got is colored cameras in the house? So that's how, that's what I'm saying. She's good at manipulating shit. She's done cropped other photo pictures." Miller stated he has a Blink account which stores his video surveillance footage. Miller showed me his four Blink cameras including the one in the bathroom. Miller stated the camera was in the bathroom due to the victim's fall risk. The other cameras are located in the dining room, living room and the exterior of the front door. Later in the interview Miller was asked if it was more reasonable to believe he had a poor recollection of the event versus the video being fake. Miller responded, "Yeah, but it is not me though. I mean, if anything... I don't do that. I mean, I got medical issues, but I don't know man... that would be the only thing." When asked if this type of incident occurred repeatedly Miller stated, "Hell no. Hell no...we've lived that life...we don't want that." This interaction was captured on my body worn camera.

Detective Cahalan #359 drafted and submitted a preservation request to the Amazon Law Enforcement Team (Blink). This preservation included all video recordings and content from Blink home surveillance devices associated with [REDACTED] registered to David J. Miller (DOB: 11/03/1963). The specific timeframe for this preservation request is from May 16, 2024, at 12:00 hours through May 16, 2025, at 12:00 hours. Amazon Reference number CRIM1412908 2025 DS.

Officer Jones #5296 photographed the bathroom and the Blink camera which captured the sexual battery. The bathroom is the same room captured in the video. Multiple distinct features match, to include the placement of the vanity, toilet, bathtub, mirror, tile size and pattern, towel racks, shower curtain, tub size and style. Additionally, the camera angle matches the placement of the blink camera photographed. The camera is a Blink Mini Cam 2 Model BCM00300U. This camera will show black and white video when lights are out because it's using its infrared (IR) night vision feature. This feature automatically switches to black and white mode when the ambient light is low, using IR LEDs to see in the dark.

Your Affiant made contact with Batten via phone, who provided an audio recorded statement. Batten advised Raleigh sent her the videos from Miller's phone in order to save them from deletion. Raleigh was leaving early for a trip with her grandchildren and therefore Batten made the report to Moreau and DCF.

Your Affiant made contact with Raleigh via phone, who provided a sworn audio statement. Raleigh advised she was involved in an altercation with Miller on the night of May 15, 2025. This occurred at [REDACTED] inside Raleigh's truck. Raleigh drove away as Miller was attempting to take items out of her truck. Later, Raleigh realized Miller left his phone inside her vehicle. Raleigh has been in an intimate relationship with Miller for approximately two years. During this timeframe she would stay at Miller's residence and assist with caring for the victim. Raleigh had concerns of infidelity and began going through Miller's phone. Raleigh opened the Blink application on Miller's phone and uncovered the videos of Miller sexually battering [REDACTED]. Raleigh recalled the time stamp of the video was May 2, 2025, at approximately

0243 hours. Raliegh recognized the people in the video as the victim and Miller on sight. Raliegh attempted to go back into the Blink application to view and retrieve additional footage, she was unable to gain access. Raliegh advised she was still in possession of Miller's phone and was at Disney's All-Star Music Resort in Orlando with her family.

Detective Key #4179 traveled to Disney's All-Star Music Resort located at 1801 W Buena Vista Dr, Lake Buena Vista, FL 32830. Detective Key made contact with Raliegh and took possession of Miller's Black Moto G Power 5G android phone (IMEI 359398501128115) with phone number 321-684-2538. The phone was transported to the Melbourne Police Department and secured as evidence. This device is confirmed to be Miller's through sworn statements provided by both Miller and Raliegh. In addition, Cell Hawk shows Miller as the registered owner of the device through AT&T.

On May 20, 2025, a search warrant for Miller's Black Moto G Power 5G android phone (IMEI 359398501128115) was signed by the Honorable Judge Moody. An extraction and search of the digital device was completed by Digital Evidence Technician Rose Gray #5339. The three Blink video clips were located on the device. Each was sent as an MMS text message to Raliegh's registered phone number. This corroborates her sworn statements. Additionally, each file contained a recorded timestamp of the message, source file information, and the Message Digest Algorithm 5 (MD5). MD5 is commonly used for data integrity verification and to ensure that a file is not altered during transmission.

Your Affiant traveled to 874 W Eau Gallie Blvd, Melbourne, FL 32935, and made contact with Raliegh who provided a sworn video statement. Raliegh corroborated her previous detail of events and added more information regarding her relationship with Miller. Raliegh provided insight into daily routines with the victim and care needs. Raliegh detailed physical abuse she witnessed occurring in the living room, and dining room areas. Raliegh recalled an incident when the victim threw her food on the floor, Miller screamed at the victim while kicking her with the inside of his foot. A second incident she recalled occurred in the bathroom, when the victim would not change her diaper. Miller again became agitated, yelling at her while striking the victim in the head with an open hand. Raliegh did not recall specific dates of these abuses. However, Raliegh detailed an argument she had with Miller approximately three weeks prior when she threatened to report him to DCF. Raliegh was concerned about Miller's actions and attempted to get him to move the victim into a home. Miller referenced this argument during his sworn video statement, "she (Raliegh) just told me... two, three weeks ago. I'm get [REDACTED] taken away from you...well, she succeeded."

On May 21, 2025, a search warrant for Amazon (Blink) was signed by the Honorable Judge Moody. The warrant requested video surveillance footage and account holder data related to Miller's Blink account. This warrant was served to Amazon.com/Blink via the Amazon Law Enforcement Request Portal. Law Enforcement Response Specialist Emily Doerge responded that Amazon had processed the legal request and did not locate any responsive information. Once a Blink account is deleted, all associated data, including clips and connected devices, is permanently erased. Blink Support explicitly states that it cannot restore deleted accounts, devices, or clips.

On May 29, 2025, your affiant made contact with Moreau via phone who provided a sworn audio statement. Moreau advised she was contacted by Batten and provided the three Blink video clips capturing the sexual battery of the victim via text message. After receiving the videos Moreau contacted DCF and provided the video clips to them. Moreau confirmed she is the Victim's APD Coordinator through J&M Support Coordination Services, Inc. Moreau previously provided several documents via email which detailed the victim's person-centered support plan, medical diagnosis, APD eligibility, and psychological evaluation.

Miller has been the victim's legal guardian and caretaker since 2007 per case number 05-2007-GA-016677-XXXX-XX. Medical records and the victim's Person-Centered Support Plan indicate the victim is non-verbal, diagnosed with down syndrome, and has a documented IQ of 20. She is unable to ambulate without a walker, she is incontinent, and unable to chew food well due to lack of teeth.

Miller has previously been charged with 1 Felony and 10 Misdemeanors in the state of Florida. These charges include but are not limited to Battery, Battery Domestic Violence, Resisting Officer Without Violence, Threat of Death on Law Enforcement Officer, Drug Possession, Failure to Appear, Possession of Drug Paraphernalia and Driving Under the Influence.


Probable cause is supported by Sworn Video Statements, Sworn Audio Statements, Digital Search Warrants, Cell Phone Extraction, Video Surveillance Footage, Digital Evidence, Photographs, Medical Documents, Court Documents, DCF Reports, Body Worn Camera Footage, Detective Interviews and Observations.

Based on the above facts, statements and physical evidence provided, your Affiant has probable cause to believe and does believe that the above listed probable cause, all leads to the substantiation that defendant, **David Jerald Miller**, has committed a violation of the laws of the State of Florida, to wit: **Sexual Battery on Mentally Defective Person**, contrary to 794.011(4)(b) Florida Statutes.

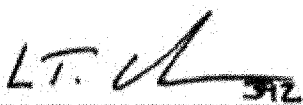
Your Affiant, Detective Christopher Thomas (hereinafter referred to as Your Affiant) is a sworn Law Enforcement Officer employed by the Melbourne Police Department. Your Affiant has been a Police Officer with the Melbourne Police Department, in Brevard County, Florida since July 2020. Your Affiant is a certified law enforcement officer in the State of Florida, his certification having been obtained after attending over 770 hours of training in the law enforcement academy at Eastern Florida State College and passing the State Exam. Your Affiant was a Patrol Officer from 2020 to 2022, holds the position of Detective currently assigned to the Criminal Investigations Division. Additionally, Your Affiant holds the positions of Defensive Tactics Instructor Vehicle Operations Instructor and is a member of the Crisis Negotiation Unit. Your affiant has conducted investigations to include burglary, armed robbery, aggravated battery, theft, fraud, false verification of ownership, dealing in stolen property, statewide prosecution cases, sexual battery, lewd and lascivious offenses. Your affiant has assisted in investigations to include homicide and officer involved shootings. Your Affiant has over 800 hours of Advanced Training,

which include subjects such as Investigative Interviews, Advanced Report Writing, Case Preparation and Courtroom Presentation, Criminal Investigative Techniques, Violent crime investigations, Suicide Investigations, Death Investigations, Field Training Officer, Defensive Tactics Instructor, and Hostage Negotiations.

WHEREAS, Your Affiant makes this affidavit and prays for the issuance of an Arrest Warrant with authority to effect the arrest of **David Jerald Miller** for the violation of the laws of the State of Florida, to wit: **Sexual Battery on Mentally Defective Person**, contrary to **794.011(4)(b)** Florida Statutes.


Detective Christopher Thomas #4858
Melbourne Police Department
Affiant

SWORN TO AND SUBSCRIBED BEFORE ME THIS 29 DAY OF MAY A.D. 2025 BY
DETECTIVE CHRISTOPHER THOMAS (Affiant) WHO IS PERSONALLY KNOWN TO ME


Lieutenant John Chapman #392
Sworn Law Enforcement Officer
BREVARD COUNTY, FLORIDA